

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	17-cr-64-DWF-KMM
)	
v.)	DECLARATION OF
)	ROBERT C. LINARES
EDWARD S. ADAMS,)	
)	
Defendant.)	

Pursuant to 28 U.S.C. § 1746, I, Robert C. Linares, under penalty of perjury hereby state:

1. I am the founder of Apollo Diamond, Inc., and its subsidiary, Apollo Diamond Gemstone Corporation. I refer to these companies collectively as “the Apollo Companies.”
2. My son-in-law, Edward S. Adams (“Adams”), as well as his law firm, Adams Monahan LLP, provided legal services to the Apollo Companies and oversaw the legal affairs of the companies and the law firms that worked on its behalf, going back to at least 2006. Adams was at all times authorized to assert the attorney-client privileges of the Apollo Companies and the attorney work product protections associated with work performed for the Apollo Companies.
3. On January 2, 2012, in my capacity as the sole remaining director of Apollo Diamond, Inc., I entered into an agreement with Adams to manage the ongoing liabilities and legal matters of the Apollo Companies. A copy of this agreement is attached as Exhibit 1 to this declaration.

4. I have never authorized the waiver of the Apollo Companies' attorney-client privileges or any attorney work product protection associated with work performed for them.

Executed this 31 th day of January, 2018.



Robert C. Linares

